

RECEIVED

UNITED STATES DISTRICT COURT

APR 28 2025

for the

US DISTRICT COURT
MID DIST TENNMiddle District of TennesseeNashville Division

Case No. _____

(to be filled in by the Clerk's Office)

Drew Allen Boden

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Eddie Farris ("See Attached")

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Drew Allen Roden

All other names by which
you have been known:

ID Number

138822

Current Institution

Putnam County Jail Corrections Division

Address

421 East Spring Street

Cookeville

TN

38501

City

State

Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Sheriff Eddie Farris

Job or Title (*if known*)

Sheriff Putnam County

Shield Number

Employer

Putnam County Sheriff's Department

Address

421 East Spring Street

Cookeville

TN

38501

City

State

Zip Code

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Lt. Kirk Vucan

Job or Title (*if known*)

Lt. Putnam County Jail Corrections

Shield Number

Employer

Putnam County Jail Corrections Division

Address

421 East Spring Street

Cookeville

TN

38501

City

State

Zip Code

☒ Individual capacity ☐ Official capacity

Defendant No. 3

Name

Phil Arms

Job or Title (if known)

Assistant Jail Administration

Shield Number

Employer

Putnam County Jail Corrections Prison

Address

421 East Spring Street

Cookeville,

TN

38501

City

State

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Joshua Hull

Job or Title (if known)

SGT. County Sheriff Deputy

Shield Number

Employer

Putnam County Sheriff's Department

Address

421 East Spring Street

Cookeville

TN

38501

City

State

Zip Code



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):



Federal officials (a *Bivens* claim)



State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

8th Amendments, 14th Amendments

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

N/A

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

"See Attached" (Page 2)

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (*check all that apply*):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (*explain*) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

"See Attached"

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

"See Attached"

- C. What date and approximate time did the events giving rise to your claim(s) occur?

@ 1:00pm - 1:30 pm

- D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Was placed in Solitary Confinement due to my Sexual orientation where the jail gives you a thin yoga mat to sleep on which caused severe back pain that requires surgery to fix and have severe mental health conditions that require attention due to the cruel and unusual punishment.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Have PTSD or Post Traumatic Stress Disorder Seizures due to the cruel treatment of jail staff and Sheriff Eddie Farris

Severe Back that requires surgery to fix

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I am requesting money damages in the amount of \$100,000 dollars so I can get my back fixed that was caused by the jail staff that Eddie Farris hired through the Putnam County Jail Corrections division.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Putnam County Jail - Cookeville, TN

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)?

All Claims that are mentioned in Statement of Claims.
Attached Sheet.

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

Putnam County jail

2. What did you claim in your grievance?

violation of stated civil rights as well as conditions of confinement.

3. What was the result, if any?

There still hasn't been a result other than deboarding us for 71 hours when claims like these are brought up to jail staff/administrators.

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I did not appeal the decision due to harsher punishments and loss of privileges.

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

11
See Attached Page 11

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this “three strikes rule”?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

3. Docket or index number

4. Name of Judge assigned to your case

5. Approximate date of filing lawsuit

6. Is the case still pending?

☐ Yes

☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 04-22-2025

Signature of Plaintiff

Printed Name of Plaintiff

Prison Identification #

Prison Address

Draw Allen Roden138822421 East Spring StreetCookeville

City

TN

State

38501

Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

"See Attached" Names of Defendants

- ① Sheriff Eddie Farns
- ② Lt. Kirk Vucan
- ③ Assistant Jail Administration phil Arms.
- ④ Joshua Hull - ~~Sergeant~~ SGT.

① Statement of Claim ("page 4 of 11")

On or about ~~January~~ January 27, 2025 to February 27, 2025 in the Middle District of TN @ 1:30pm I was taken from pod Delta Cell 42 and placed in SP-Cell #1 and placed on Administrative PC (Protective Custody). Assistant jail Administrator phil Arms came back to Sp-cell #1 and explained why I was placed in Solitary Confinement due to my Sexual Orientation with me being part of the LGBTQ+ Community. He phil Arms stated that it was due to everyone safety that was in pod Delta so I wouldn't hurt anybody else. I am suing the Attached Defendants in this lawsuit for violations of my civil rights as well as Discrimination from jail staff. I was placed on Commissary Restrictions per request from Sheriff Eddie Farris and was not giving an explanation as to why I was placed on Commissary Restrictions and placed multiple Grievances and Request Forms trying to figure out why I was placed on these Restrictions. 4-17-25 @ 1:00pm Jail Staff Brought in Drug K-9 Dogs into pod Delta and placed everyone on the walls and was very Disrespectful to everyone.

②

also was Cussing and Hollering at us.

Section D The Defendants acted under color of State or local law by unlawfully placing me in Solitary Confinement for my Sexual Orientation and unlawfully Strip Searching me while laughing at me. Also refuses me outdoor Rec to where Sunlight is Needed. refuses to do laundry on laundry schedule Days as well as cleaning Supplies to keep Cells clean for healthy and safe living conditions. Also Denies us Reading materials such as Books when every other pod receives Book Cart. We also Get Denied Access to law library or programs to help us for when we get released from our incarceration or to help us with our pending Criminal Cases. I'm asking the Court today if the relief damages gets denied as Moot, I would like to put in a Transfer to another County jail that houses pretrial Detainees so I can get access to programs that will help me live a productive life once released from my incarceration. When Federal inmates come back from Federal District Court we have to sit in a dry cell with No running water and no flushable toilet for 24 hours or Sometimes more than 24 hours with no mats, No water, NO flushable toilet and that Causes me severe back Pain we also receive no blankets to cover up with and get treated inhuman when asked to get some water to drink or a toilet flushed.

Proceed to page 3

③ we also have to sit and smell other inmates poop and pee and have to sit in a dry cell with other peoples poop and blood smeared on the walls which is inhuman. When you ask Correctional Deputies or address these issues to them they threaten to Deboard us with loss of Privileges, and or put us in Solitary Confinement Cells for more than 24 hours. I have exhausted multiple Grievances and multiple request forms about these issues and don't hear anything back from the Grievances or request for months at a time. And Once they respond to these issues they either say I will address this issue or forward this issue to someone that has jurisdiction on that particular Department and nothing gets Done about these specific issues. I also wrote Sheriff Eddie Farris about me being placed on Commissary Restrictions and as to what the reasons were and never received a Response back from him. I also written multiple letters exhausting my concerns to about the Conditions of Confinement for all Federal Detainees as well as State and County Detainees. With No Luck Received No response back on that Note either. I have Tried to Exhaust my Remedies and seems not to do anything. My only option Now is to Bring this legal Action up in Court. I warned jail Staff of these issues and told them I will be required to take legal Action if issues or my

④ Concerns were Not addressed Accordingly. So Now I am asking the Federal District Court to have Mercy and realize the concerns as we and other Federal Inmates are going through here at the putnam County jail. As well as the State and County inmates. I have Multiple witnesses to collaborate my story as well as County and State and local and County inmates. Whenever Needed Can Call upon witnesses or give The District Court witness Statements upon request if Needed. To help make this process a lot easier. These are Not just My Rights being violated it is other Federal Inmates and County State and local inmates as well. We get denied religious activities such as church and once we receive Bibles the jail Staff takes them and we have to request another one, but sometimes we Cannot do that Because we Can Only get one every 180 days so I have been without a bible Since I was thrown into an sp-Cell Solitary Confinement and told I was a sinner and Couldn't have one. I also addressed this in my Court hearing on February 12, 2025 to the District Judge Eli Richardson. And Nothing has been done about these issues. The jail Staff has denied me access to write or Correspond with My Attorney and Filed a Grievance on these issues

⑤ And Was giving a Generic Response stating "I will look into this issue" and was not taken out of Solitary Confinement until I responded back stating the where violating my Civil rights as an inmate and that is when I was taken out of Sp-Cell. 5 days later after that I submitted that response I was removed and taken back to Unit Delta and placed in Cell Number 38 and was still left on Admin. PC for 2 weeks and had a loss of privileges and was sometimes denied Recreation time to where I couldn't have the same privileges as any other inmate had or has. There was also times when I had blood or hair in my food and pushed the Emergency Button to where I could get another Tray and Lt. Kirk Vucan denied me a Tray on multiple occasions where we got into a heated argument that was started by Lt. Vucan which in the end he brought me a tray after I stated that he was required to bring me another Tray. The Putnam County Jail will lock people down and deny them recreation time and access to the legal Law Library for 71 hours which is 3 days. I have been suffering from mental health crisis as well as Back pain that requires Surgery. The jail staff also violated a right by using unnecessary use of force during shake downs and cell searches.

⑥ by dogs (K-9) coming in our 2 man cells and eating or taking commissary purchased items that are still in the original containers to where we will have to spend more money on commissary items. I am seeking a \$100,000 dollar in damages as well as a Transfer out of the Putnam County jail and away from jail staff who are causing serious harm and denying recreational time as well as legal law library time. I am asking the court to consider my lawsuit and Transfer as well.

Please and Thank You.

Drew Allen Roden

421 East Spring Street

Cookeville, TN 38501

Federal Inmate

Case No. 1:23-cr-00001-1

District judge: Eli Richardson

Attorney ~~for plaintiff~~

Jerry Gonzalez, PLC Rockvale, TN 37153

Drew A. Roden
etc pin: 138822
421 East Spring Street
Cookeville, TN 38501

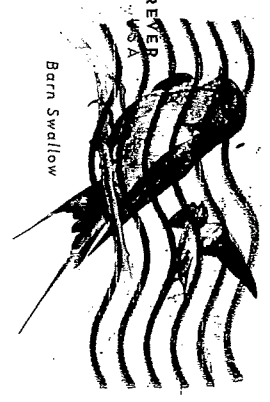
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